

EXHIBIT 1

QUINN EMANUEL URQUHART & SULLIVAN, LLP
Charles K. Verhoeven (Cal. Bar No. 170151)
charlesverhoeven@quinnemanuel.com
David Perlson (Cal. Bar No. 209502)
davidperlson@quinnemanuel.com
Melissa J. Baily (Cal. Bar No. 237649)
melissabaily@quinnemanuel.com
John Neukom (Cal. Bar No. 275887)
johnneukom@quinnemanuel.com
Jordan R. Jaffe (Cal. Bar No. 254886)
jordanjaffe@quinnemanuel.com
50 California Street, 22nd Floor
San Francisco, California 94111-4788
(415) 875-6600
(415) 875-6700 facsimile

Attorneys for Plaintiff WAYMO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO, LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 17-cv-00939-WHA

**AMENDED DOCUMENT REQUESTS TO
HELP DETERMINE RESPONSIVENESS
IN CONDUCTING SEARCH FOR
MISAPPROPRIATED DOCUMENTS**

Honorable William H. Alsup

Pursuant to the parties' agreement at the April 13, 2017 conference with Special Master Cooper, Plaintiff Waymo LLC hereby provides a set of twenty-five document requests for Defendants to use to help determine responsiveness when reviewing hits to search terms and otherwise reviewing documents in response to paragraph 4 of the Court's March 16, 2017 order (Dkt. 61) and related follow-on orders.

DEFINITIONS

"Waymo" means Waymo's self-driving car project, from its inception at Google Inc. in 2009 through the present.

"Defendants" means Uber Technologies, Inc. ("Uber"), Ottomotto LLC and Otto Trucking LLC (together, "Otto"), 280 Systems, Inc. ("280 Systems"), Tyto LiDAR, LLC ("Tyto LiDAR"), and Odin Wave.

"PCB" means printed circuit board.

"LiDAR system" means a light detection and ranging device, system, or prototype, and/or designs, drawings, or concepts for such a device, system, or prototype.

REQUESTS

REQUEST FOR PRODUCTION NO. 1:

Documents reflecting a curved PCB.

REQUEST FOR PRODUCTION NO. 2:

Documents reflecting multiple laser diodes arranged on a curved PCB.

REQUEST FOR PRODUCTION NO. 3:

Documents reflecting a transmit PCB containing laser diodes spaced at varying intervals.

REQUEST FOR PRODUCTION NO. 4:

Documents reflecting a transmit PCB containing laser diodes whose angular orientation varies.

1 **REQUEST FOR PRODUCTION NO. 5:**

2 Documents reflecting a LiDAR system comprising a single optical cavity.

3 **REQUEST FOR PRODUCTION NO. 6:**

4 Documents reflecting an optical cavity for a LiDAR system comprising a single
5 transmit/receive lens.

6 **REQUEST FOR PRODUCTION NO. 7:**

7 Documents reflecting a LiDAR system comprising more than four transmit PCBs.

8 **REQUEST FOR PRODUCTION NO. 8:**

9 Documents reflecting a flexible receive PCB.

10 **REQUEST FOR PRODUCTION NO. 9:**

11 Documents reflecting a receive PCB containing 64 photodetectors.

12 **REQUEST FOR PRODUCTION NO. 10:**

13 Documents reflecting transmit PCB containing multiple laser diodes spaced by under 3
14 millimeters.

15 **REQUEST FOR PRODUCTION NO. 11:**

16 Documents reflecting a cylindrical lens that both pre-collimates a laser diode's output
17 beam and alters the angle of the beam.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 Documents reflecting the purpose of precisely drilled holes on a transmit PCB.

20 **REQUEST FOR PRODUCTION NO. 13:**

21 Documents reflecting a receive PCB containing a circuit for driving avalanche
22 photodiodes by using a transistor.

1 **REQUEST FOR PRODUCTION NO. 14:**

2 Documents reflecting a LiDAR system that uses a single-beam laser with fiber
3 amplification.

4 **REQUEST FOR PRODUCTION NO. 15:**

5 Documents reflecting motor coils designed to be fabricated directly on a PCB.

6 **REQUEST FOR PRODUCTION NO. 16:**

7 Documents reflecting a LiDAR system containing two modules, with one module
8 consisting of a single-beam laser and fiber amplifiers, and another module consisting of the optics
9 for transmitting and receiving the beam from and to the environment.

10 **REQUEST FOR PRODUCTION NO. 17:**

11 Documents reflecting the rates at which the laser diodes are fired in a 64 beam LiDAR
12 system.

13 **REQUEST FOR PRODUCTION NO. 18:**

14 Documents reflecting the amounts of power per shot used for laser diodes in a 64 beam
15 LiDAR system.

16 **REQUEST FOR PRODUCTION NO. 19:**

17 Documents reflecting a LiDAR system achieving a constant vertical resolution at short
18 ranges.

19 **REQUEST FOR PRODUCTION NO. 20:**

20 Documents reflecting a transmit PCB containing 10 or 11 laser diodes.

21 **REQUEST FOR PRODUCTION NO. 21:**

22 Documents reflecting a LiDAR system containing a toroidal lens.

23 **REQUEST FOR PRODUCTION NO. 22:**

24 Documents reflecting the vertical field of view of a 64 beam LiDAR system.

1
2 DATED: April 14, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

3
4 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

Attorneys for WAYMO LLC

5
6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28